



***Fire  
Fighting  
Foam  
Coalition***

9 February 2021

Subject: Testimony in Support of Connecticut Senate Bill 837 with Amendments

Honorable Co-Chairs Cohen and Borer and Members of the Committee:

My name is Mitch Hubert. Thank you for the opportunity to address your committee today.

I hold degrees in both Biology and Chemistry and have been working in the firefighting foam industry for more than 40 years as a formulation chemist and fire fighter.

I am here today as Technical Director of the Fire Fighting Foam Coalition (FFFC) to express our support for S 837 with amendments. Our coalition is made up of foam manufacturers from throughout the world who fully support efforts to reduce the use of PFAS foams and are working feverishly to develop and improve non-fluorinated alternatives.

Unfortunately, there are still fire scenarios and industry segments where the current technology utilized in fluorine-free foams falls short of providing the type of performance that can assure that large catastrophic fires can be successfully fought and extinguished, and which provide a measure of safety for firefighters and other first responders. S 837 recognizes this fact and provides an avenue for the continued use of fluorinated foams for high hazard petroleum fuel applications where alternatives are not available. FFFC supports the overall concept of foam users working with state regulators to identify facilities that have a continued need to use fluorinated foams.

In addition to petroleum-based fuels, there are other fire scenarios involving non-petroleum fuels where the use of fluorinated foams may still be required. This is particularly true for the use of foam in fixed systems where polar fuels such as acetone, alcohols and other water miscible chemicals are being handled. Currently there are no fluorine-free foams approved by Factory Mutual or Underwriters Laboratory for this specific application. FFFC would propose that the bill provide an avenue for the continued use of fluorinated foams in some fixed foam systems similar to that currently proposed for petroleum-based fires. This could be accomplished by adding "or a fixed foam system" after "petroleum-based fire" in (3)(c).

The proposed legislation would require most foam users in the state to have transitioned to fluorine-free foams in a little over two years, which could prove challenging, especially under current conditions. Fluorine-free foams are not drop-in replacements for fluorinated foams and may require equipment and operational changes to implement successfully. Recently proposed foam regulations in the European Union and New Zealand provide for a 5-year transition period. FFFC would propose extended the phase out date for firefighting uses from July 1, 2023 to January 1, 2025.

FFFC has worked to develop legislation in other states that bans the use of PFAS foams for testing and training and limits their use to high hazard applications where alternatives are not yet fully effective. We look forward to working with members to include amendments in S 837 that provide for the continued use of fluorinated foams for these important uses.

Respectfully submitted,

Mitch Hubert  
Technical Director  
Fire Fighting Foam Coalition (FFFC)